

JAMES KOUSOUROS
ATTORNEY AT LAW

JAMES KOUSOUROS
FOUNDER & PRINCIPAL

260 Madison Avenue, 22nd floor • New York, NY 10016

212•532•1934 / 212•532•1939 fax

E-mail: James@kousouroslaw.com

EMMA J. COLE
LEGAL ASSISTANT

BY ECF

Hon. Lorna G. Schofield
United States District Judge

Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

SO ORDERED

Dated: September 17, 2020
New York, New York

Re: United States v. Jose Cespedes, 20 Cr. 369 (LGS)



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield,

We write to respectfully request a modification to the bond set by Your Honor in the above captioned matter. Mr. Cespedes was released on a bond in the amount of \$750,000.00 secured by the posting of three properties located at 55 Palisade Avenue, Yonkers, New York, 10701, 115 Young Avenue, Yonkers, New York, 10710 and 407 Villas Court, Chester, Virginia 23836 and four suretors. To date, all suretors have executed the bond and confessions of judgement have been filed in Westchester County for the properties located at 55 Palisade Avenue and 115 Young Avenue. Copies of the confessions of judgement have been provided to the Government. Mr. Cespedes has surrendered his expired passport to the undersigned.

With regard to the property located at 407 Villas Court, Chester, Virginia 23836, we have secured a signed and notarized confession of judgment from Jasmary Tineo and provided this to the Government. The clerk's office in Virginia has indicated that they do not accept confessions of judgment and that in order to file a lien, we would have to secure counsel to file a motion. The cost of the lien would be approximately \$2,600.00. In lieu of filing this confession of judgment, the Government has agreed to accept the signed and notarized confession of judgment along with an affidavit from Ms. Tineo acknowledging the lien and agreeing to not encumber the property in any way during the pendency of these proceedings. We have provided both the confession of judgment and the affidavit to the Government.

We respectfully ask that the bond be modified to omit the filing of the confession of judgment in Virginia pursuant to the terms set forth above. Thank you for your courtesy and consideration.

Respectfully Submitted,

/s/_____

James Kousouros, Esq.

c.c.

Peter Davis
Assistant United States Attorney